

# NEU STAR

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EXECUTIVE SECRETARY

December 2, 1999

Mr. David Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

99-00784

Re: Relief of the Tennessee 615 area code

Dear Mr. Waddell:

This letter is to advise you that a reduction in the demand for central office (CO) codes and recent reclamation of codes in the 615 NPA could delay the exhaust of this NPA for several years. Consequently, NeuStar, Inc., North American Numbering Plan Administrator (NANPA) recommends that the implementation intervals proposed by the Tennessee telecommunications industry as a part of our filing to the TRA in August 1999 be proportionately extended outward to accommodate these new developments.

On August 31, 1999, NANPA submitted on behalf of the telecommunications industry in Tennessee, the industry recommendation for relief of Tennessee's 615 area code. The industry reached consensus to recommend relief Alternative #1; an all services distributed overlay, as the method of relief.

At that time, the exhaust of the 615 area code was projected to be the fourth quarter of 2000. However, a significant and unexpected reduction in demand as well as the reclamation of codes has led us to re-examine that exhaust. Over the last 12 months, the actual demand for central office codes has been about two-thirds less than the demand projected earlier this year in the April 1999 Central Office Code Utilization Survey (COCUS). Further, 41 codes will be reclaimed in the 615 NPA in January 2000. The result is the 615 area code is now projected to exhaust in the first quarter of 2003. To reflect this new and welcome information, we are proposing a new implementation time line for relief of the 615 NPA for consideration.

A potential<sup>1</sup> implementation timeline based on the new projected exhaust date follows:

Tennessee Regulatory Authority decision - by mid November 2001

Transitional Dialing Period Begins - 180 days after the TRA issues a final relief plan order

But no sooner than May 15, 2002

Mandatory Dialing Begins - 180 days after the commencement of the transitional dialing period

The recommended timeline will help ensure sufficient time for service providers to modify their networks and to educate telecommunications customers about the introduction of a new area code in Tennessee.

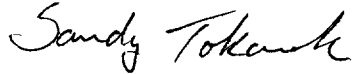
<sup>1</sup> The transitional and mandatory dates are predicated on the selection of an all services overlay and would not necessarily be applicable to a geographic split.

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One final note. As you know the demand for CO codes could increase and change the projected exhaust date. Should that occur, we would immediately notify both the Commission and the Service Providers in the 615 NPA of any changes and the impact on the above timeline.

Sincerely,

A handwritten signature in cursive script that reads "Sandy Tokarek".

Sandy Tokarek  
Senior Relief Planner- Central Region  
NANPA

Cc: Jim Deak - NANPA  
615 Code Holders and Other Industry Members